

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

In re: )  
 )  
FULL SPECTRUM PEDIATRIC ) Case No. 3:23-bk-01220  
THERAPY, INC., ) Chapter 11  
 ) Judge Marian F. Harrison  
Debtors. )

**OBJECTION TO DEBTOR'S CHAPTER 11 PLAN OF REORGANIZATION**

Comes now creditors Tabetha Baggett, Christina Bovell, Hayley Crozier, Jayne Hallock, Jeffrey McCracken, Elizabeth Middlebrooks, Sandra Mohon, Taylor Pagan, Allison Smith, and Terri Swaw (collectively, the “FLSA Creditors”) and files this Objection (the “Objection”) to the *Debtor’s Chapter 11 Plan of Reorganization* (the “Plan”)(Docket No. 2). In support of their Objection, the FLSA Creditors state as follows:

The Plan proposes a \$1,000.00 monthly payment on the Debtor’s priority debt claim<sup>1</sup> and make a \$750.00 monthly payment to the pool of unsecured creditors in Class 5, which is a total monthly plan payment of \$1,750.00.

The Debtor’s monthly operating reports filed for April, 2023 show that the Debtor, following the payment of all monthly debts, generated a net profit of \$10,000.00 for the month (See Docket No. 42). While the FLSA Creditors acknowledge that month-to-month net profit may fluctuate, the gulf between the \$1,750 proposed in this Plan and the \$10,000.00 actual net profit is too vast to ignore. Given this significant gap between the plan payment and actual net profit received, the FLSA Creditors assert that the Debtor’s plan has not been proposed in the good faith and therefore violates 11 U.S.C. § 1129(a)(3), made applicable herein by 11 U.S.C. §1191(a).

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<sup>1</sup> The FLSA Creditors acknowledge that this payment will likely change based upon the claims filed by the IRS and U.S. Trustee’s Objection to Confirmation.

Given that the Debtor's Plan was not proposed in good faith and does not provide a good faith payment to the creditors based on the amounts received by the Debtor, the FLSA Creditors respectfully request that this Court deny confirmation of the Plan.

Dated: May 16, 2023.

Respectfully Submitted,

/s/ Justin T. Campbell

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above Notice of Appearance and Request for Service was filed via the Court's CM/ECF system, with service to all parties electing electronic service through the CM/ECF system, and those listed below by U.S. Mail this 16<sup>th</sup> day of May, 2023.

Steven L. Lefkovitz  
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/s/ Justin T. Campbell  
Justin T. Campbell